

1 E. MARTIN ESTRADA
United States Attorney
2 SCOTT M. GARRINGER
Assistant United States Attorney
3 Chief, Criminal Division
JONATHAN GALATZAN
Assistant United States Attorney
4 Chief, Asset Forfeiture Section
MAXWELL COLL
5 California Bar No. 312651
Assistant United States Attorney
6 Asset Forfeiture Section
7 Federal Courthouse, 14th Floor
8 312 North Spring Street
Los Angeles, California 90012
9 Telephone: (213) 894-1785
Facsimile: (213) 894-1042
10 E-mail: Maxwell.Coll@usdoj.gov

11 Attorneys for Plaintiff
UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
14 WESTERN DIVISION

15 UNITED STATES OF AMERICA,
16 Plaintiff,
17
18 v.
19 ONE ANCIENT MOSAIC,
20 Defendant.

21
22
23 MOHAMAD YASSIN ALCHARIHI,
24 Claimant.

No. 2:18-CV-04420-JFW-SSx

PLAINTIFF UNITED STATES OF
AMERICA'S EX PARTE APPLICATION FOR
AN ORDER UNSEALING THE
DECLARATIONS OF SPECIAL AGENT
ELIZABETH RIVAS; DECLARATION OF
AUSA MAXWELL COLL

25
26 The United States of America hereby applies to this Court ex
27 parte for an order unsealing the declarations of Special Agent
28 Elizabeth Rivas filed in the above-captioned civil-forfeiture action
on December 20, 2018 (Dkt. 45); February 21, 2019 (Dkt. 52); April

22, 2019 (Dkt. 58); June 20, 2019 (Dkt. 63); August 20, 2019 (Dkt. 68); October 23, 2019 (Dkt. 75); December 18, 2019 (Dkt. 80); February 14, 2020 (Dkt. 86); April 15, 2020 (Dkt. 91); and June 12, 2020 (Dkt. 96). This application is based on the attached declaration of AUSA Maxwell Coll and the records and files of this case.

DATED: September 22, 2022

Respectfully submitted,

E. MARTIN ESTRADA
United States Attorney
SCOTT M. GARRINGER
Assistant United States Attorney
Chief, Criminal Division
JONATHAN GALATZAN
Assistant United States Attorney
Chief, Asset Forfeiture Section

/s/ Maxwell Coll
MAXWELL COLL
Assistant United States Attorney

Attorneys for
UNITED STATES OF AMERICA

DECLARATION OF AUSA MAXWELL COLL

I, Maxwell Coll, hereby declare and state as follows:

1. I am an Assistant United States Attorney for the Central District of California. This declaration is made in support of the government's application for an order unsealing several declarations of Special Agent Elizabeth Rivas filed in United States v. One Ancient Mosaic, 2:18-CV-04420-JFW-SSx. The government filed the sealed declarations in support of the parties' stipulated request to stay the civil-forfeiture proceeding pending the parallel criminal investigation and criminal case, United States v. Mohamad Yassin Alcharihi, 2:20-CR-00307-GW, and in connection with several status reports filed after this Court granted the requested stay.

Specifically, the government seeks to unseal the declarations filed on December 20, 2018 (Dkt. 45); February 21, 2019 (Dkt. 52); April 22, 2019 (Dkt. 58); June 20, 2019 (Dkt. 63); August 20, 2019 (Dkt. 68); October 23, 2019 (Dkt. 75); December 18, 2019 (Dkt. 80); February 14, 2020 (Dkt. 86); April 15, 2020 (Dkt. 91); and June 12, 2020 (Dkt. 96).

2. At the time the government filed the sealed declarations, the government's investigation and preparation for criminal trial was ongoing, and it was necessary to seal the declarations so as not to jeopardize the investigation and reveal the government's trial strategy.

3. The government believes that the facts and circumstances that initially warranted sealing in this case are no longer in effect. Accordingly, the government seeks to produce the affidavits to defense counsel as part of the discovery process in United States v. Mohamad Yassin Alcharihi, 2:20-CR-00307-GW.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

/s/ Maxwell Coll
MAXWELL COLL
Assistant United States Attorney